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August 11, 1992

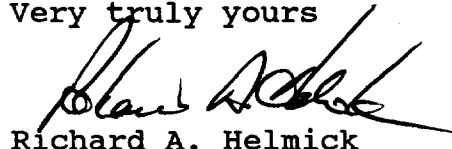
RM 8071

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Ms. Searcy

Submitted on behalf of Olympic Broadcasters, Inc., licensee of FM Broadcast Station KQNC, Quincy, California, are an original and four copies of its Petition for Rulemaking requesting amendment of the Table of Allotments for FM Broadcast Stations, Section 73.202(b) of the Commission's Rules.

Very truly yours



Richard A. Helmick

Enclosure

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BEFORE THE

Federal Communications Commission

In the Matter of)
)
Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations)
(Quincy and Susanville, California))

RM- 8071

To: Chief, Mass Media Bureau

PETITION FOR RULEMAKING

Olympic Broadcasters, Inc. ("Olympic"), licensee of FM Broadcast Station KQNC, Quincy, California, through its attorneys and pursuant to Sections 1.419 and 1.420 of the Commission's Rules, hereby requests that the Table of Allotments for FM Broadcast Stations, Section 73.202(b) of the Commission's Rules, be amended as follows and that the license of KQNC be modified accordingly to specify Susanville as its city of license:

<u>City</u>	<u>Channel No.</u>	
	<u>Present</u>	<u>Proposed</u>
Quincy, California	262A, 271A 276A	262A, 276A
Susanville, California	227C, 242C2	227C, 242C2 271C2

In support thereof, the following is set forth.

1. At Olympic's request, the channel allocation for KQNC was downgraded from 271C2 to 271A in order to accommodate an upgrade for commonly owned Station KFIA-FM, Shingle Springs, California,

from 270B1 to 270B, effective July 6, 1992. 7 FCC Rcd 3113 (Mass Media Bureau 1992). An application implementing the downgrade to KQNC is currently pending with the Commission (Application File No. BPH-920730IG). The instant petition seeks to move the KQNC channel allocation from Quincy to Susanville, California so that it can be upgraded to its former Class C2 status and to modify the license of KQNC to specify operation on FM Channel 271C2 at Susanville, California.

2. The proposed change in the KQNC city of license from Quincy to Susanville^{*/} would be consistent with Commission policy as it would create a more fair, efficient and equitable distribution of radio service. Modification of FM and TV Authorizations to Specify New Communities of License, 4 FCC Rcd 4870 (1989), recon. 5 FCC Rcd 7094 (1990). Susanville (1990 population, 7,279) is the county seat of Lassen County (1990 population, 27,598); Susanville has three local transmission services -- KSUE(AM), a 1 kW unlimited station, KSUE-FM, a Class C station, and KKLC, a new Class C3 station not yet on the air. Quincy, California (1990 population, 2,700) is the county seat of Plumas County (1990 population, 19,739); Quincy has four local transmission services -- KQNC, KPCO(AM), a 5 kW daytime, 500 watt nighttime station, and KNLF and KZDD, both new Class A stations not

^{*/} Susanville is located approximately 37 miles northeast of Quincy.

yet on the air. Thus, Susanville, with a population 2.7 times as large as Quincy, has one less local transmission service than does Quincy; in cases where one community has more service, the Commission has compared the relative level of service in the two communities by looking at the number of local service transmission sources in proportion to the population of the communities. See, e.g., Sumter and Columbia, South Carolina, 5 FCC Rcd 10 (Broadcast Bureau 1990); Lenoir and Blowing Rock of North Carolina, 4 FCC Rcd 2642 (Mass Media Bureau 1989).

3. The proposed amendment of the FM Table of Allotments would result in a preferential arrangement of allotments by providing Susanville, a city of almost three times the population of Quincy, with its fourth local transmission service while still leaving Quincy with three local transmission services. Moreover, the proposal would permit Station KQNC to upgrade and return to its former Class C2 status, thereby making maximum use of its frequency allocation. Finally, the proposed amendment of the FM Table of Allocation is consistent with the goals of Section 307(b) of the Communications Act of 1934, as amended, and Section 1.420(i) of the Commission's Rules.

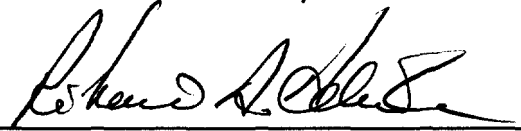
4. Set forth as an attachment is the Engineering Statement of W. Richard Green asserting that the proposal is fully consistent with the Commission's minimum channel spacing requirements and principal city coverage requirements. Accordingly, Olympic submits

that its proposal would serve the public interest and the Commission is requested to issue a Notice of Proposed Rulemaking to implement the instant petition for rulemaking.

Respectfully submitted

OLYMPIC BROADCASTERS, INC.

By


Richard A. Helmick, Esq.

COHN AND MARKS
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Suite 600
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(202) 293-3860

Its Attorneys

August 11, 1992

ENGINEERING STATEMENT

FOR

OLYMPIC BROADCASTERS INC.

Licensee of KQNC-FM @ Quincy, California

W. Richard Green and Associates has been retained by Olympic Broadcasters Inc. to prepare the engineering portion of a petition to change the community of license of KQNC-FM from Quincy, California to Susanville, California.

PROPOSED CHANGES

It is proposed to change the Community of License of FM channel 271-A from Quincy, California to Susanville, California and simuloutaneously upgrade the allocation from a class A to class C-2.

Attached is a tabulated FM channel spacing study specifying a well established telecommunications/transmitter site located near Susanville, California. As is demonstrated, there is complete clearance to all existing and proposed FM transmitter facilities as well as all proposed FM allocations.

Also attached is an Area-To-Locate map which clearly shows the proposed allocation coordinates as well as a nominal 3.16 MV/M predicted contour from a theoretical class C-2 transmission facility located at that site.

The theoretical coverage map demonstrates that the predicted 70 DBU contour would cover the entire community of Susanville, California.

**W. RICHARD GREEN & ASSOCIATES
CONSULTING ENGINEERS**

W. Richard Green, 7/7/92
W. Richard Green Date

FM CHANNEL SPACING STUDY

Job title: KQNC C2 ALLOCATION STUDY

Channel: 271-C2

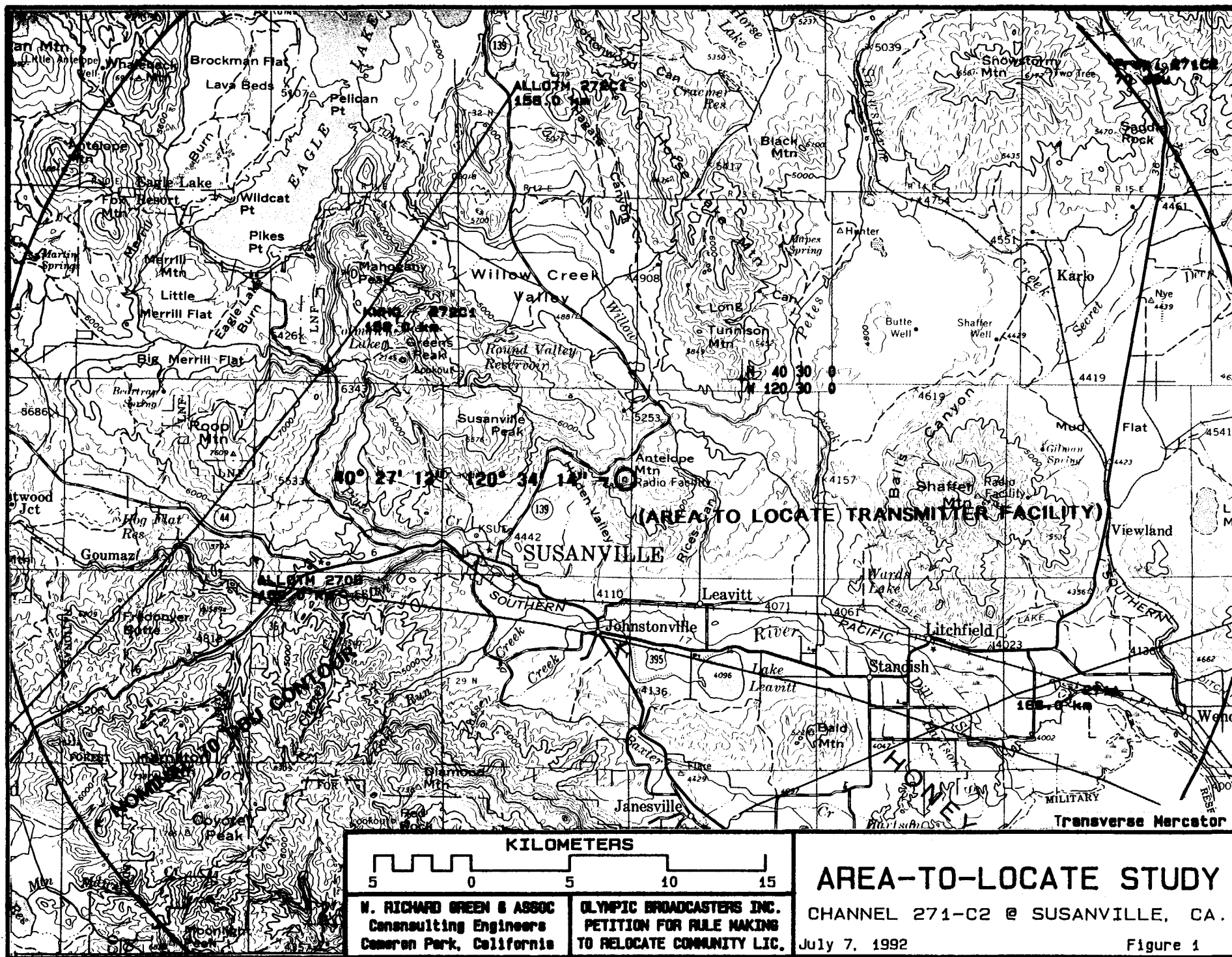
Database file name: FM920625.EDX

Latitude: 40 27 13

Longitude: 120 34 14

CH	Call	Record	City	ST	Status	Bear.	Dist.	Dist.	Result
271A		20486	Minden	NV	ADD	154.7	183.5	166.0	17.5
273C2		20516	Virginia City	NV	ADD	140.7	140.9	58.0	
269A	KTHX	20540	Reno	NV	DEL	145.5	116.9	55.0	
269A	KTHX	20550	Reno	NV	LIC	145.5	116.9	55.0	
270B1	KFIAFM	20852	Shingle Springs	CA	LIC	187.0	203.9	134.0	
270B		20858	Shingle Springs	CA	VACANT	191.1	176.7	169.0	7.7
271C2	KQNC	20903	Quincy	CA	LIC	213.7	52.5	190.0	-137.5
271A		20905	Quincy	CA	VACANT	213.7	52.5	166.0	-113.5
268A	NEW	21323	Gridley	CA	APP	219.4	148.7	55.0	
274C2	KFXS	21714	Red Bluff	CA	LIC	260.9	130.8	58.0	
272C1		21736	Weed	CA	VACANT	305.7	173.9	158.0	15.9
272C1	KWHO	21755	Weed	CA	APP	305.7	173.9	158.0	15.9
270C		21763	Ashland	OR	VACANT	319.2	274.2	188.0	
270C	KCMXFM	21764	Ashland	OR	APP	319.2	274.2	188.0	

***** End of channel 271 study *****



W. RICHARD GREEN & ASSOC
Consulting Engineers
Cameron Park, California

OLYMPIC BROADCASTERS INC.
PETITION FOR RULE MAKING
TO RELOCATE COMMUNITY LIC.

AREA-TO-LOCATE STUDY

CHANNEL 271-C2 @ SUSANVILLE, CA.

July 7, 1992

Figure 1